

December 23, 2024

VIA ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (GBD) (SN)
Request for Extension to File Response to Ashton Plaintiffs' Motion for Service of Judgment (MDL Dkt. 10626)

Dear Judge Daniels and Magistrate Judge Netburn:

On behalf of the Joint Creditors¹, and with the consent of the Consolidated Ashton Plaintiffs, we submit this letter to request a fourteen-day extension of the deadline to file a response to the Ashton Plaintiffs' motion of December 12, 2024, which seeks the Court's authorization for alternative service of partial final judgments against the Taliban on the Taliban and Da Afghanistan Bank. *See* MDL Dkt. 10626 at 3.

The Joint Creditors are working together to consider the Ashton Plaintiffs' motion and, if warranted, coordinate their response to the motion. Given the need to coordinate legal positions across several groups of judgment creditors, as well as general unavailability during the holiday season, the Joint Creditors request a fourteen-day extension of the fourteen-day deadline. Currently, a response to the motion is due December 26, 2024. The Joint Creditors propose that the deadline be extended to January 9, 2024. The Ashton Plaintiffs have kindly consented to this proposed extension.

This is the Joint Creditors' first request for an extension of this deadline. We thank the Court for its consideration of this request.

¹ The Joint Creditors are the Plaintiffs in the following cases: *Smith v. The Islamic Emirate of Afghanistan, et al.*, No. 01-cv-10132 (the "Smith Creditors"), *Havlish, et al. v. Bin Laden, et al.*, No. 03-cv-9848 (the "Havlish Creditors"), *Fed Ins. Co., et al. v. Al Qaida, et al.*, No. 03-cv-6978 (the "Federal Insurance Creditors"), and *John Does 1 Through 7 v. The Taliban, et al.*, No. 20-mc-740 (the "Doe Creditors"). *See* MDL Dkt. 8866 at 1 n.1.

Page 2

Respectfully submitted,

/s/ Douglas A. Mitchell
Douglass A. Mitchell (*pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001
(202) 639-6090
dmitchell@jenner.com

Counsel for Judgment Creditors Fiona Havlish, et al.

/s/ Orlando do Campo
Orlando do Campo
John Thornton (*pro hac vice*)
Daniela Jaramillo (*pro hac vice*)
DO CAMPO & THORNTON, P.A.
150 S.E. 2nd Avenue, Ste. 602
Miami, FL 33131
(305) 358-6600
od@dandtlaw.com

Counsel for Judgment Creditors John Does 1-7

/s/ Sean P. Carter, Esq.
Sean P. Carter, Esq.
Stephen A. Cozen, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1650 Market Street
Philadelphia, PA 19103
Tel: (215) 665-2105
scarter1@cozen.com

Counsel for Judgment Creditors Federal Insurance Co., et al.

/s/ James Edwin Beasley
James Edwin Beasley
The Beasley Firm, LLC
1125 Walnut Street
Philadelphia, PA 19107
(215)-592-1000
bjb@beasleyfirm.com

Counsel for Judgment Creditors Estate of Smith, et al.

Page 3

cc: All counsel of record (by ECF)